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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT TACOMA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

No. 3:20-cv-6164

11 v.

12 **COMPLAINT**

13 DEEDREANNE OTERO,

14 Defendant.

15 Plaintiff, the United States of America, by and through its undersigned attorneys, brings
16 this complaint against Defendant DEEDREANNE OTERO, and alleges the following:

17 **I. NATURE OF THIS ACTION**

18 1. Starting as early as September 2019 and continuing to the present, Defendant
19 has conducted financial transactions with large sums of illegally obtained money, knowing that
20 her transactions are designed to conceal the nature, source, location, ownership, and control of
21 proceeds. Defendant's conduct includes knowingly receiving money obtained via fraud and
22 then immediately transmitting the same money to accomplices. Defendant has transmitted
23 money to and from accomplices in Nigeria and the United States.

1 2. The United States seeks to prevent continuing and substantial injury to the
2 United States and victims by bringing this action for a permanent injunction and other equitable
3 relief under 18 U.S.C. § 1345. The United States seeks to enjoin the ongoing commission of
4 banking law violations as defined in 18 U.S.C. § 3322(d), including money laundering in
5 violation of 18 U.S.C. § 1956(a)(1)(B), international money laundering in violation of 18
6 U.S.C. § 1956(a)(2)(B), and structuring cash transactions to evade transaction reporting
7 requirements in violation of 31 U.S.C. § 5324(a).

8 **II. JURISDICTION AND VENUE**

9 3. This Court has jurisdiction over this action under 18 U.S.C. § 1345 and 28
10 U.S.C. §§ 1331 and 1345.

11 4. The United States District Court for the Western District of Washington is a
12 proper venue for this action under 28 U.S.C. § 1391(b)(1) & (b)(2) because Defendant is a
13 resident of this District and because a substantial part of the events or omissions giving rise to
14 this Complaint occurred in this District.

15 **III. PARTIES**

16 5. Plaintiff is the United States.

17 6. Defendant Deedreanne Otero is a resident of this District, residing in Bremerton,
18 Washington. In connection with the matters alleged herein, Defendant transacts and has
19 transacted business in this District.

20 **IV. FACTS**

21 **A. Defendant's Ongoing Banking Law Violations**

22 7. Defendant conducts financial transactions to benefit one or more international
23 fraud schemes, knowing that the moneys she receives and transmits are obtained fraudulently,

1 knowing that her transactions are designed to conceal the schemes, and structuring her cash
2 transactions in an effort to prevent the filing of required financial transaction reports.

3 Defendant receives financial compensation for this conduct, by transmitting to an accomplice
4 slightly smaller amounts than she receives and keeping the difference for herself.

5 **(I) Money laundering and international money laundering**

6 8. Beginning at least as early as September 2019, Defendant has knowingly and
7 willingly accepted hundreds of thousands of dollars from multiple sources and then transmitted
8 most of that money to accomplices, including to locations outside the United States, such as
9 Nigeria.

10 9. Defendant befriended an accomplice through Facebook in early 2020. Shortly
11 after that, she began receiving direct deposits, wire transfers, and other deposits from a variety
12 of sources and then transferring much of that money to other individuals outside the United
13 States, through electronic withdrawals, wire transfers, and other financial transactions.

14 10. Starting on or around May 27, 2020, and continuing through September 22,
15 2020, Defendant transacted approximately \$214,000 through her Chase banking account.
16 Defendant received multiple direct deposits, wire transfers, checks, money orders, and other
17 transfers into her account, for a total of at least \$107,000. Subsequent to these deposits,
18 Defendant made multiple withdrawals, including through electronic peer-to-peer transfers, wire
19 transfers, debit card transactions, cash withdrawals, and other transfers, for a total of at least
20 \$106,000. Approximately \$85,000 was sent by wire to Defendant's accomplice in Nigeria and
21 \$12,500 were payments to retail or other Washington State business locations, and the
22 remainder was cash withdrawals.

23 11. Chase contacted Defendant about these transactions and ultimately closed
Defendant's bank accounts because of the suspicious activity.

1 12. Starting on or around September 5, 2019, and continuing through June 29, 2020,
2 Defendant received and sent a series of wire transfers. Specifically, Defendant received 14
3 transfers from 11 different senders in the United States, Canada, Norway, and Serbia and then
4 sent a total of 11 transfers to payees in the United States, Turkey, and Nigeria. None of the
5 individuals had any identifiable relationship with Defendant. Moneygram and Western Union
6 ultimately blocked Defendant from sending wire transfers.

7 13. Defendant also sent money to her accomplice in Nigeria through a variety of
8 online services, such as giving her accomplice access to her Bitcoin account (i.e. online wallet)
9 and through Xoom wire transfers to First Bank of Nigeria.

10 **(2) Structuring**

11 14. Defendant engaged in conduct designed to cause domestic financial institutions
12 to fail to file a report required under 31 U.S.C. § 5313(a), and the regulations promulgated
13 thereunder. Defendant repeatedly caused and attempted to cause her cash withdrawals to be
14 structured in amounts designed to avoid this transaction reporting requirement.

15 15. For example, Defendant made multiple cash withdrawals from her Chase
16 account for a total of \$9,200 and multiple wire transfers in order to avoid reporting
17 requirements.

18 **B. Defendant's Knowledge of Fraud; Intent to Conceal the Nature, Source, Location,**
19 **Ownership, or Control of Proceeds; and Intent to Evade Transaction Reporting**
20 **Requirements**

21 16. On information and belief, Defendant has engaged in the financial transactions
22 alleged in Paragraphs 7 through 15 with the knowledge that the moneys she receives from and
23 transmits to accomplices are obtained by fraud schemes or other specified unlawful activity.

17. On information and belief, Defendant has engaged in the financial transactions alleged in Paragraphs 7 through 12 with the intent to conceal the nature, source, location, ownership, or control of proceeds.

18. On information and belief, Defendant has engaged in the financial transactions alleged in Paragraphs 14 and 15 with the intent to evade transaction reporting requirements.

C. Harm to the United States

19. The United States is suffering continuing and substantial injury from Defendant's banking law violations.

20. Defendant is continuing to facilitate her banking law violations. Absent injunctive relief by this Court, Defendant will continue to cause continuing and substantial injury to the United States and victims.

COUNT I
(18 U.S.C. § 1345 – Injunctive Relief)

21. The United States re-alleges and incorporates by reference Paragraphs 1 through
20 of this Complaint as though fully set forth herein.

22. By reason of the conduct described herein, Defendant has committed, is committing, and is about to commit banking law violations as defined in 18 U.S.C. § 3322(d), including money laundering with intent to conceal in violation of 18 U.S.C. § 1956(a)(1)(B)(i), money laundering with intent to evade transaction reporting requirements in violation of 18 U.S.C. § 1956(a)(1)(B)(ii), international money laundering with intent to conceal in violation of 18 U.S.C. § 1956(a)(2)(B)(i), international money laundering with intent to evade transaction reporting requirements in violation of 18 U.S.C. § 1956(a)(2)(B)(ii), and structuring cash transactions to evade transaction reporting requirements in violation of 31 U.S.C. § 5324.

23. Because Defendant is committing or about to commit banking law violations as defined in 18 U.S.C. § 3322(d), the United States is entitled, under 18 U.S.C. § 1345, to seek a permanent injunction restraining all future banking law violations and any other action that this Court deems just to prevent a continuing and substantial injury to the United States.

24. As a result of the foregoing, Defendant's conduct should be enjoined pursuant to
18 U.S.C. § 1345.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff, United States of America, requests of the Court the following relief:

A. That the Court issue a permanent injunction, pursuant to 18 U.S.C. § 1345, ordering that Defendant is restrained from engaging, participating, or assisting in money laundering, international money laundering, structuring transactions to evade transaction reporting requirements, and any money transmitting business; and

B. That the Court order such other and further relief as the Court shall deem just and proper.

Respectfully submitted this 30th day of November, 2020.

BRIAN T. MORAN
United States Attorney

s/ Nickolas Bohl
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Counsel for United States of America

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Western District of Washington and is the person of such age and discretion as to be competent to serve papers;

It is further certified that on this day, I mailed by United States Postal Service said pleading to Defendant, addressed as follows:

Deedreanne Otero
3426 Almira Dr., Apt C
Bremerton, WA 98310

Dated this 30th day of November, 2020.

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